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IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION	)	CASE NO. AVU-E-16-06
OF AVISTA CORPORATION FOR A	)	<del>REDACTED</del>
FINDING OF PRUDENCE FOR 2014-2015	)	
EXPENDITURES ASSOCIATED WITH	)	
PROVIDING ELECTRIC AND NATURAL GAS	)	DIRECT TESTIMONY
ENERGY EFFICIENCY SERVICE IN THE	)	OF
STATE OF IDAHO	)	DAN JOHNSON
	)	

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

1 I. INTRODUCTION

2 Q. Please state your name, employer and business  
3 address.

4 A. My name is Dan Johnson. I am employed by Avista  
5 as Director, Energy Efficiency. My business address is East  
6 1411 Mission Avenue, Spokane, Washington.

7 Q. Would you please describe your education and  
8 business experience?

9 A. I graduated from the University of Washington with  
10 Bachelor of Science degree in Civil Engineering. I received  
11 a Masters in Engineering Management degree from Portland  
12 State University.

13 I joined the Company in 2010 as the Project Manager for  
14 the Smartgrid Demonstration Project. I began my current  
15 duties as the Director of Energy Efficiency in June of 2014.

16 Prior to joining Avista, I was employed by the Spokane  
17 International Airport where I was the Director of  
18 Engineering and Planning and prior to that I was with Pacific  
19 Gas Transmission Co, a high pressure gas transmission  
20 company.

21 Q. What is the scope of your testimony in this  
22 proceeding?

1           A.    I will provide an overview of the Company's 2014-  
2   2015 Idaho DSM portfolio results and expenditures for  
3   electric and natural gas efficiency programs. I address  
4   Avista's involvement with the Northwest Energy Efficiency  
5   Alliance (NEEA), the status of the Company's recent re-  
6   instated natural gas DSM programs, and the evaluation by  
7   Avista's third-party contractor "Nexant" I will also provide  
8   an update on the Company's university research and  
9   development activities.

10           **Q.    Do you sponsor exhibits?**

11           A.    Yes, I present three exhibits. Exhibit No. 1,  
12   Schedule 1 is Avista's 2014 Annual Demand-Side Management  
13   Report, and Schedule 2 is Avista's 2015 Annual Demand-Side  
14   Management Report. These reports include the summary of DSM  
15   energy savings and a summary of electric DSM cost-  
16   effectiveness. Exhibit No. 1, Schedule 3 is a summary of  
17   2015 research and development projects, funded by the DSM  
18   tariff rider.

19

1           **II. OVERVIEW OF DSM PROGRAMS AND CURRENT ISSUES**  
2

3           **Q. Would you please provide a brief overview of**  
4 **Avista's DSM programs?**

5           A. Yes. Avista has continuously offered energy  
6 efficiency services since 1978. This is the twenty-second  
7 year of the DSM tariff rider, a distribution charge to fund  
8 DSM that is now replicated in many other states. Schedule  
9 91 currently has a rate equal to 2.7% of retail revenue for  
10 electric service, and the Schedule 191 rate is 2.2% of retail  
11 revenue for natural gas.

12          As described, the Company's programs are delivered  
13 across a full customer spectrum. Virtually all customers  
14 have had the opportunity to participate and many have  
15 directly benefited from the program offerings. All customers  
16 have benefited through enhanced resource cost-efficiencies  
17 as a result of this portfolio approach.

18          **Q. What were the Company's energy efficiency targets**  
19 **and results for 2014-15?**

20          A. The Company's energy efficiency targets are  
21 established in the process of developing the Electric and  
22 Natural Gas Integrated Resource Plans (IRPs). The targets  
23 derived through the resource planning efforts provide a



1 starting point for program planning which is accomplished  
2 through the annual business planning process where program  
3 offerings are optimized for the Company's service territory  
4 based on current economic and market conditions.

5 The results of Avista's energy efficiency programs  
6 exceeded the 2014 IRP target but fell short in 2015 of the  
7 targets established as part of this IRP process, as shown in  
8 Table No. 1 below. Idaho energy efficiency savings for 2014  
9 were 16,292 MWh and savings for 2015 were 14,789 MWh. This  
10 represents 100% of the Company's two-year IRP target of  
11 30,996 MWh for this period, not including 4,030 first-year  
12 MWh acquired through NEEA.

13 **Table No. 1**

Time Period of Reported Savings	Local Evaluated MWh Savings	IRP Target	Percent Achieved
2014	16,292	15,330	106%
2015	14,789	15,666	94%
2014-2015	31,081	30,996	100%

14

15 Avista's 2014-15 Annual Reports provided in Exhibit No.  
16 1, Schedules 1 and 2 support these figures.

17 Over 197 aMW of cumulative savings have been achieved  
18 through Avista's energy efficiency efforts in the past  
19 thirty-eight years, of which 127 aMW of DSM is currently in  
20 place on the Company's system, and approximately 37 aMW in

1 our Idaho service territory. Current Company-sponsored  
2 conservation reduces retail loads by 11.0 percent.

3 In January 2016 Avista re-instated its Idaho natural  
4 gas programs after working with the Commission Staff to  
5 evaluate new cost effective data and analysis. Avista is  
6 now providing natural gas incentive programs for both  
7 residential and commercial customers. We are currently  
8 seeing increased awareness with rebates of \$579,277 and  
9 therm savings of 92,964 from January through July 2016.

10 **Q. How does Avista make available its DSM program**  
11 **offerings and educate customers about energy savings?**

12 A. Avista provides opportunities for customers to  
13 learn about rebates we offer as well as tips on how to better  
14 manage their home and business energy usage. We utilize  
15 broadcast media with our "Efficiency Matters" campaign to  
16 help increase awareness about energy efficiency. We also use  
17 online, radio, and print advertising - as well as our  
18 website, avistautilities.com - to help educate customers on  
19 rebates and energy savings tips. Our "Energy Use Guide"  
20 contains information that can be utilized throughout the  
21 year to help encourage efficient use of space heating and  
22 cooling, appliances, electronics, and more. Online tools on  
23 our website can perform a free energy analysis to help

1 customers have a better understanding of how energy is being  
2 used in their home, and outline the top ways they can save  
3 energy. Home Energy Reports are also delivered to a randomly  
4 selected group of approximately 25,200 Idaho customers  
5 annually. The reports are designed to help customers better  
6 assess their energy consumption and explore ways to reduce  
7 their energy use.

8 In addition, both residential and nonresidential  
9 customers have access to direct outreach activities. Avista  
10 offers energy fairs and workshops for residential customers,  
11 with emphasis given to low-income customers. Direct  
12 outreach for nonresidential customers is delivered through  
13 account executives and efficiency engineers who provide on-  
14 site information regarding energy savings opportunities and  
15 available program information.

16 **Q. Please describe the residential DSM program and**  
17 **offerings provided in 2014-2015.**

18 A. The Company's residential portfolio provides a  
19 variety of measures, through different delivery channels,  
20 offering energy efficiency improvement opportunities to  
21 Avista customers. The majority of the residential portfolio  
22 is implemented through prescriptive rebates, processed in-  
23 house by Avista. New construction and existing residential

1 homes (up to four-plex) that heat with Avista electric or  
2 natural gas, can select from a list of energy efficiency  
3 measures available for installation in their homes.  
4 Customers must purchase and install the equipment or  
5 qualifying energy efficiency measure and submit a rebate  
6 application with the appropriate documentation within 90  
7 days of installation in order to receive an incentive.

8 In the 2014 and 2015 program years, Avista offered the  
9 following residential programs to Idaho electric customers  
10 noted in Illustration No. 1:

11 **Illustration No. 1:**

12 **RESIDENTIAL**

13 High Efficiency Variable Speed Motor  
14 High Efficiency Tanked Water Heater  
15 Space Heat Conversion (Direct Use of Natural Gas)  
16 Water Heat Conversion (Direct Use of Natural Gas)  
17 Multifamily Natural Gas Market Transformation (Direct  
18 Use of Natural Gas)  
19 Ceiling, Attic, Floor, Wall Insulation  
20 Energy Efficient Windows  
21 ENERGY STAR® Homes  
22 ENERGY STAR® Appliances  
23 CFL (and CFL Recycling) Promotions  
24 "Second" Refrigerator/Freezer Recycling Program -  
25 (Discontinued mid-2015)  
26 Community Events and Workshops  
27 Low-cost/no-cost information  
28 On-line Home Energy Audits and Analysis  
29 Simple Steps Smart Savings (CFLs, LEDs and Showerheads)

1       The residential programs shown above are primarily  
2 standard offerings, otherwise known as prescriptive  
3 programs.

4       Idaho residential customers also received Avista-  
5 sponsored programs in the form of manufacturer buy-downs for  
6 compact fluorescent lighting (CFL), light-emitting diodes  
7 (LED's) and low-flow showerhead measures (Simple Steps Smart  
8 Savings). These products have a lower retail price point at  
9 the time of purchase and are usually part of a regional,  
10 multi-state program offering.

11       **Q. Please describe the nonresidential DSM offerings**  
12 **provided during this time.**

13       A. Within the nonresidential segment, programs are  
14 offered to retail electric and natural gas customers through  
15 a combination of prescriptive rebates and site specific  
16 assessments. Prescriptive rebates are geared toward  
17 relatively uniform measures, applications and energy  
18 savings. This delivery method reduces implementation expense  
19 while simplifying participation for both customers and trade  
20 allies.

21       The site specific offerings are available for all other  
22 efficiency measures and applications that are unique to a  
23 customer's business. In these situations, each energy



1 efficiency project is individually analyzed based on the  
2 measure being installed and considers other variables that  
3 may be present in the building or in the process operation.

4 Illustration No. 2 below includes a list of  
5 nonresidential rebates available for electric customers in  
6 the 2014 and 2015 program years:

7 **Illustration No. 2:**

8 **NONRESIDENTIAL (COMMERCIAL & INDUSTRIAL)**

9 EnergySmart Grocer  
10 Power Management for PC Networks  
11 \*Premium Efficiency Motors  
12 Food Service Equipment  
13 Commercial HVAC Variable Frequency Drives  
14 Retro-Commissioning  
15 Commercial Clothes Washers  
16 Lighting and Controls  
17 Green Motors Rewind Program  
18 \*Commercial Windows and Insulation  
19 \*Commercial Water Heater Program  
20 \*Standby Generator Block Heater  
21 Site Specific Offerings in Various End Uses

22 \*Discontinued in 2015, moved to site-specific program

23 Avista offers site-specific incentives for commercial  
24 and industrial customers for custom projects. The site-  
25 specific program provides incentives on cost-effective  
26 commercial and industrial energy efficiency measures that  
27 meet required simple payback and measure life requirements.  
28 This is implemented through on-site audits and analyses,  
29 customized project evaluation, and dual fuel incentive

1 calculators for energy savings generated specific to the  
2 customer's premise or process ("project"). Incentives were  
3 offered for any measure that had greater than a one-year and  
4 less than an eight-year simple payback for lighting measures  
5 or less than a thirteen-year simple payback for non-lighting  
6 measures.

7       **Q.    How does Avista address energy efficiency programs**  
8 **for low-income customers?**

9       A.    The residential low-income program is comprised  
10 primarily of site-specific offerings delivered by local  
11 Community Action Agencies (CAAs) to benefit income-  
12 qualified, residential customers. Avista contracts with  
13 agencies to utilize existing infrastructure currently in  
14 place as a result of delivering the Federal Weatherization  
15 Assistance and Low Income Home Energy Assistance Programs  
16 (LIHEAP). The customer intake process includes potential  
17 consideration of participation for energy assistance and  
18 other income-qualified programs that can also serve as  
19 referrals for weatherization services.

20       The program targeted to low-income customers is  
21 provided by the Community Action Partnership of Lewiston.  
22 The agency receives a set amount of funding each year to  
23 make energy efficiency improvements to income-qualified

1 homes that are heated by Avista electric or natural gas  
2 services. These improvements may include upgrades to heating  
3 and water heating equipment, ceiling, wall and floor  
4 insulation, replacement of windows, doors, and conversions  
5 from electric heating to natural gas heating.

6 **Q. What was the cost of Avista's electric efficiency**  
7 **acquisitions?**

8 A. During 2014-15, the Company spent \$9,999,742 on  
9 Idaho electric DSM programs, of which 47% was paid out to  
10 customers in direct incentives pursuant to the cost-  
11 effectiveness tests shown in Exhibit No. 1, Schedules 1 and  
12 2. This percentage does not include additional benefits  
13 such as technical analyses provided to customers by the  
14 Company's DSM engineering staff or regional market  
15 transformation efforts through NEEA.

16 **Q. Do the 2014-15 results reflect Avista's**  
17 **participation in regional energy efficiency efforts?**

18 A. No. The numbers reported only include the local  
19 acquisition evaluated by the Company's independent evaluator  
20 Nexant, and do not include 4,030 MWh of first-year Idaho  
21 savings acquired through Northwest Energy Efficiency  
22 Alliance's (NEEA) regional efforts. NEEA focuses on using  
23 a regional approach to obtain electric efficiency through

1 the transformation of markets for efficiency measures and  
2 services. Avista has been a member of the NEEA, and actively  
3 involved in its governance, since the creation of that  
4 organization in 1996. As one of fourteen funders, Avista is  
5 supportive of the use of a coordinated regional market  
6 transformation effort to the extent that the effort is a  
7 cost-effective enhancement of, or alternative to, local  
8 utility efforts at acquiring those resources for our  
9 customers. Avista has committed to NEEA's next funding  
10 period of 2015 through 2019, opting in for all NEEA  
11 initiatives.

12 The levelized cost of resources acquired through  
13 Avista's Idaho participation in NEEA was \$28.9 per first  
14 year MWh. This compares with \$28.4 per first-year MWh for  
15 Avista-funded local cost-effective energy efficiency  
16 programs in Idaho. During 2014 Avista's Idaho-related NEEA  
17 funding was \$603,481, and for 2015 Avista's Idaho-related  
18 NEEA funding was \$563,571.

19 As will be discussed late in my testimony, the Idaho  
20 electric programs have been cost-effective, including  
21 Avista's participation in NEEA, from both a Total Resource  
22 Cost (TRC) test and Program Administrator Cost (PAC) test  
23 perspective.

1           **Q.    What is the status of the Idaho electric and**  
2           **natural gas tariff rider balances?**

3           A.    At December 31, 2015, the Idaho electric and  
4           natural gas tariff rider balances were \$431,784 underfunded  
5           and \$60,768 underfunded, respectively (i.e. dollars expended  
6           exceeded dollars collected through the Tariff Rider)<sup>1</sup>.

7           **Q.    Please describe the opportunity for external**  
8           **participation in Avista's DSM activities.**

9           A.    The Company has had continuous energy efficiency  
10          stakeholder involvement since 1992. The Company's program  
11          offerings, planning, evaluation findings, underlying cost-  
12          effectiveness tests and results are reviewed during  
13          stakeholder meetings. Currently, the Company holds in-person  
14          meetings at least twice per year, hosts several webinars  
15          annually, provides a full analysis of the results of DSM  
16          operations on an annual and monthly basis, identifies large  
17          projects and provides a quarterly newsletter summarizing  
18          recent DSM activities<sup>2</sup>. Since January 2016, Avista has held  
19          several meetings with its Advisory Group, by way of  
20          conference calls, emails and webinars as well as two in-

---

<sup>1</sup> The tariff rider adjustments were approved effective October 1, 2013 for electric and January 1, 2016 for natural gas.

<sup>2</sup>With appropriate precautions for customer confidentiality.



1 person meetings. The spring meeting, which was on the heels  
2 of the Spring NEEA Energy Exchange Conference in Coeur  
3 d'Alene, ID, was one of the most attended meetings in several  
4 years, with 12 external members in-person and two additional  
5 externals calling in. In addition, the Company had numerous  
6 phone discussions with the Advisory Group on topics related  
7 to DSM activities, as well as current and future evaluations.  
8 Avista's DSM Advisory Group consists of interested  
9 regulatory, consumer and energy industry parties<sup>3</sup>.

10 Avista appreciates the active engagement of many  
11 parties, including the Commission Staff as part of our Energy  
12 Efficiency Advisory Group. Additionally, the Snake River  
13 Alliance, the Northwest Energy Coalition, University of  
14 Idaho Integrated Design Lab, and the Northwest Industrial  
15 Gas Users have representation on Avista's Advisory Group.

### 16 III. PRUDENCE OF INCURRED DSM COSTS

17 **Q. Would you please explain the Company's request for**  
18 **a finding of prudence in this case?**

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<sup>3</sup> The Advisory Group is Avista's non-binding oversight and advisory group for energy efficiency. The Advisory group is currently composed of the IPUC Staff, UTC staff, OPUC Staff, the Public Counsel Unit of the Washington Office of Attorney General, Northwest Energy Coalition, SNAP, The Energy Project, Northwest Energy Efficiency Alliance, Northwest Power and Conservation Council, Northwest Energy Efficiency Council, Idaho Conservation League, Putnam Price and the Opportunity Council.

1           A.    Yes. The Idaho electric programs have been cost-  
2   effective from both a Total Resource Cost (TRC) test and  
3   Program Administrator Cost (PAC) test perspective. The 2014  
4   TRC benefit-to-cost ratio of 1.76 for the Idaho electric DSM  
5   portfolio is cost-effective, with a residual TRC benefit to  
6   customers of over \$6.0 million as provided in Exhibit No.1,  
7   Schedule 1. The 2015 TRC benefit-to-cost ratio of 1.29 for  
8   the Idaho electric DSM portfolio is cost-effective, with a  
9   residual TRC benefit to customers of over \$2.4 million. The  
10   PAC, also known as the Utility Cost Test (UCT), benefit-to-  
11   cost ratio during 2014 was 3.22, with a residual PAC benefit  
12   of nearly \$9.1 million. The benefit-to-cost ratio during  
13   2015 was 2.39, with a residual PAC benefit of nearly \$6.1  
14   million. These are summarized in Exhibit No. 1, Schedule 2,  
15   starting at page 6.

16           **Q.    Please summarize the Company's energy efficiency-**  
17   **related savings for this period?**

18           A.    From January 1, 2014 through December 31, 2015,  
19   the Company achieved 35,111 MWh of savings, including NEEA,  
20   on a gross basis. Pages 6 through 11 of Exhibit No. 1,  
21   Schedule 1 detail the energy savings by regular and low-  
22   income portfolios for both electric and natural gas DSM  
23   programs.

1           **Q.    What evaluation of the Company's DSM programs have**  
2           **occurred?**

3           A.    Nexant performed independent, or "third-party"  
4           impact and process evaluation on Avista's DSM programs for  
5           the 2014-15 period. Impact evaluation is intended to verify,  
6           and adjust as necessary, "claimed" savings. Process  
7           evaluation reviews "procedures" for continual improvement.

8           Nexant concluded that Avista's Idaho electric DSM  
9           programs achieved 31,081 MWh in 2014-15 cost-effectively and  
10          that Avista's 2014-2015 energy efficiency programs addressed  
11          all impact and process evaluation needs in accordance with  
12          industry and regulatory standards.

13          **Q.    What efforts to improve the management of its DSM**  
14          **program has Avista made since its last request for DSM**  
15          **prudence in Idaho?**

16          A.    Avista continues to actively manage and monitor  
17          the progress of its programs that are delivered to customers  
18          with an emphasis on continuous improvements. We hold weekly  
19          meetings with Program Managers and Management to serve as an  
20          opportunity for status reports on project progress, results,  
21          and current issues. Avista's DSM management continues to  
22          focus on the employment of utility best practices related to  
23          DSM program implementation and oversight.

1           The Company's DSM team achieved its combined 2014-2015  
2 savings targets, by continuously innovating, adapting, and  
3 expanding program offerings. The Company remains committed  
4 to its approach to energy efficiency, based on two key  
5 principles. The first is to pursue all cost-effective  
6 kilowatt hours and therms by offering financial incentives  
7 for most energy saving measures with a simple financial  
8 payback of over one year. The second key principle is to  
9 use the most effective "mechanism" to deliver energy  
10 efficiency services to customers.

11           Avista is finalizing contract negotiations with Nexant  
12 to purchase and integrate their iEnergy DSM Central  
13 enterprise software as the single system of record. The  
14 Company believes that a single system of record will improve  
15 its reporting ability, as well as, increase transparency by  
16 providing external stakeholders remote access. The Company  
17 has been utilizing past business mapping exercises, as well  
18 as coordinating with other regional utilities on potential  
19 program templates which may help speed the software  
20 integration.

21

1 IV. SUMMARY OF REQUEST

2 Q. Please summarize Avista's request in this case?

3 A. The Company requests a finding that the  
4 expenditure of tariff rider revenue has been reasonable and  
5 prudent. A portfolio of programs covering all customer  
6 classes has been offered with gross savings of 35,111 MWh  
7 during January 1, 2014 through December 31, 2015. The 2014-  
8 15 UCT benefit-to-cost ratio of 2.79 for the electric DSM  
9 portfolio is cost-effective.

10 The Tariff Rider funded programs have been successful.  
11 Participating customers have benefited through lower bills.  
12 Non-participating customers have benefited from the Company  
13 having acquired lower cost resources as well as maintaining  
14 the energy efficiency message and infrastructure for the  
15 benefit of our service territory.

16 V. OTHER COMPANY WITNESSES

17 Q. Would you please provide a brief summary of the  
18 testimony of the other witness representing Avista in this  
19 proceeding?

20 A. Yes. The following additional witness is  
21 sponsoring direct testimony on behalf of Avista:

22 Lynn Roy, CEM, Principal at Nexant will present the  
23 results of third party verification of Avista's 2014-15 DSM



1 electric portfolio. Ms. Roy will describe the methodology  
2 and conclusions of her company's independent impact  
3 evaluations and process evaluations that are a central  
4 component of Avista's Evaluation, Measurement, and  
5 Verification (EM&V) Framework and EM&V Plan.

6 Her testimony concludes that Avista's Idaho electric  
7 DSM programs achieved 31,081 MWh in 2014-15 cost-effectively  
8 and that Avista's 2014-2015 energy efficiency programs  
9 addressed all impact and process evaluation needs in  
10 accordance with industry and regulatory standards.

11 **VI. IDAHO RESEARCH AND DEVELOPMENT**

12 **Q. Please provide an update on Avista's research and**  
13 **development work with Idaho Universities.**

14 A. On August 30, 2013 Avista filed a request with the  
15 Commission to authorize up to \$300,000 per year of Schedule  
16 91, DSM Tariff Rider revenue to fund applied research at  
17 Idaho's universities through a "call for papers" approach.  
18 The intent of this initiative is to supplement the pipeline  
19 of emerging technology. The Commission approved this request  
20 in Case No. AVU-E-13-08 on October 30, 2013. The Company  
21 filed its Annual Report on March 31, 2016.

22 The following is a brief description of each of the  
23 four selected projects for the 2015-2016 collegiate year:

1  
2 Increasing Hydropower Generating Efficiency through Drag  
3 Reduction: Energy loss due to friction occurs at various  
4 phases of hydropower generation. This research investigates  
5 the potential of reducing the energy loss in the penstock so  
6 that more energy is available for power generation. The  
7 concrete/cement surface of penstock inner walls is  
8 hydrophilic. Nanotechnology has made it possible to make  
9 these surfaces hydrophobic or even super-hydrophobic.  
10 Frictional drag reduction by hydrophobicity over concrete  
11 surface treated with Zycosil has not been demonstrated or  
12 quantified. This project evaluates the potential of  
13 frictional drag reduction over Zycosil-treated surfaces.  
14

15 Bidirectional Charger Effects on Local Electrical Grids with  
16 Limited Access: With the increasing popularity of electrical  
17 vehicles and the anticipated decrease in their purchase  
18 prices over the next several years, electrical vehicles are  
19 coming to every commercial and academic campus. On-site  
20 charging is a benefit that many employers may want to  
21 provide. This project proposes to build a bidirectional  
22 charging system on a university campus, a system that  
23 operates within the voltages and power levels typical of a  
24 home or small commercial building. We will use this charger  
25 to investigate the effects of bidirectional charging on the  
26 electrical utility system within the building and on nearby  
27 buildings.  
28

29 Simulation-Based Commissioning of Energy Management Control  
30 Systems: The research aims to develop a method to use energy  
31 simulation and co-simulation software to perform automated  
32 and semi-automated pre-commissioning or retrocommissioning  
33 (Cx) of the programming that resides inside a constructed  
34 building's energy management control system (EMS). This  
35 phase of the research is to complete manual proof of concept  
36 work, benchmark baseline performance of a chosen test site,  
37 and estimate energy savings potential via simulation of  
38 alternate building control strategies.  
39

40 Residential Static VAR Compensator: To develop a smart  
41 demand-side management device based on the concept of a  
42 Residential Static VAR Compensator (RSVC) for regulating  
43 residential voltages, especially during peak demand hours.  
44 The proposed residential static VAR compensator reduces

1 power consumption during peak hours in order to save energy  
2 and costs of generation.

3

4 Q. Does that complete your pre-filed direct  
5 testimony?

6 A. Yes, it does.